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Civil Action No.: 2:22-cv-144

**THE UNIVERSITY OF VERMONT AND
STATE AGRICULTURAL COLLEGE;
THE BOARD OF TRUSTEES OF THE
UNIVERSITY OF VERMONT AND STATE
AGRICULTURAL COLLEGE; KATHERINE
SPENCE**, individually and as agent for The University
of Vermont and State Agricultural College; **EMILY
MCCARTHY**, individually and as agent for The
University of Vermont and State Agricultural College;
ANNA EPSHTEYN, individually and as agent for The
University of Vermont and State Agricultural College; and
THOMAS MERCURIO; individually and as agent for
The University of Vermont and State Agricultural
College;

Defendants.

The Plaintiff John Doe, by its undersigned attorneys, respectfully requests the *pro hac vice* admission of Andrew Todd Miltenberg as co-counsel in association with the undersigned local counsel. In support thereof, the Plaintiff states as follows:

1. Andrew Todd Miltenberg is a lawyer with the law firm Nesenoff & Miltenberg, LLP, 363 Seventh Avenue, 5th Floor, New York, New York 10013.
2. As the accompanying Affidavit (Exhibit 1) demonstrates, Attorney Andrew Todd Miltenberg is a member in good standing of the Bar of the State of New York and all other courts to which he is admitted to practice.

3. Attorney Andrew Todd Miltenberg will be actively associated with undersigned counsel, Evan Barquist, who is a member of the Bar of this Court.

4. Counsel for the Defendant University of Vermont et al. has been contacted often by Attorney Miltenberg's office to discuss the instant matter pre-suit, and the attorneys have had a professional and courteous relationship for years. While Attorney Miltenberg believes esteemed outside counsel would assent to the relief requested by this Motion, we were unable to confirm same today prior to filing.

5. No memorandum in support of this motion is necessary as the relief sought is within the discretion of the Court.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

- A. Grant the Motion for Admission *Pro Hac Vice*; and
- B. Grant such other and further relief as may be just and proper.

Dated: July 26, 2022

Respectfully submitted,

JOHN DOE

By his Attorneys,

By:


/s/ Evan Barquist

Evan Barquist, Esq.

VT Bar # 5002

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